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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF ROSSANA BAEZA
 IN SUPPORT OF PLAINTIFFS'
 ADMINISTRATIVE MOTION
 REGARDING THEIR RENEWED
 REQUEST TO DEPOSE GOOGLE CEO
 SUNDAR PICHAI**

The Honorable Susan van Keulen

DECLARATION OF ROSSANA BAEZA

I, Rossana Baeza, declare as follows.

1. I am an attorney with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an active member in good standing of the bar of Florida. I am admitted *pro hac vice* in this case (Dkt. 11). I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 7-11(b), I submit this Declaration in Support of Plaintiffs' Administrative Motion Regarding Their Renewed Request to Depose Google CEO Sundar Pichai.

3. On April 5, 2022, Plaintiffs requested that Google stipulate to defer briefing on any renewed request to depose Mr. Pichai. *See* Exhibit 1.

4. About three weeks later, after not receiving a response from Google, Plaintiffs followed up with Google about this request.

5. Google then stated that it did not consent to Plaintiffs' proposed stipulation because "Google believes a renewed request is improper and would also fail" and because "a stipulation is unnecessary." *Id.*

6. As a result, Plaintiffs were unable to obtain a stipulation from Google.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 29th day of April, 2022 in Miami, Florida.

/s/ Rossana Baeza
Rossana Baeza